

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

**07-20195CR-MARTINEZ**

18 U.S.C. § 1029(a)(1)  
18 U.S.C. § 1029(b)(2)  
18 U.S.C. § 1028A(1)  
18 U.S.C. § 982(b)

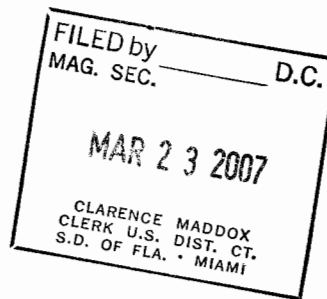
**MAGISTRATE JUDGE  
BANDSTRA**

**UNITED STATES OF AMERICA**

**vs.**

**VIRGINIO RUDY SUAREZ,  
a/k/a "Lulo,"  
MIGUEL SUAREZ,  
ALBERTO CHANG CABRERA,  
a/k/a "Chino,"  
MARIETTA MONTESINO-SUAREZ,  
JULIO RAMIREZ,  
a/k/a "Cacho,"  
LAZARO FUNDORA,  
a/k/a "Tata,"  
and  
CELIS ALVAREZ,  
a/k/a "Alexis,"**

**Defendants.**



**INDICTMENT**

The Grand Jury charges that:

**COUNT 1**

From in or about January, 2007, and continuing until the date of the return of this Indictment, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**VIRGINIO RUDY SUAREZ,  
a/k/a "Lulo,"  
MIGUEL SUAREZ,**

**ALBERTO CHANG CABRERA,  
a/k/a "Chino,"  
MARIETTA MONTESINO-SUAREZ,  
JULIO RAMIREZ,  
a/k/a "Cacho,"  
LAZARO FUNDORA,  
a/k/a "Tata,"  
and  
CELIS ALVAREZ,  
a/k/a "Alexis,"**

did knowingly and intentionally combine, conspire, confederate, and agree with each other and with persons known and unknown to the Grand Jury, to commit violations of Title 18, United States Code, Section 1029, that is, to knowingly and with intent to defraud, produce, use and traffic in one or more counterfeit access devices, that is, credit card account numbers, said conduct affecting interstate and foreign commerce, in violation of Title 18, United States Code, Section 1029(a)(1).

**OVERT ACTS**

In furtherance of this conspiracy and to achieve its objectives, at least one of the conspirators committed and caused to be committed, in the Southern District of Florida, at least one of the following overt acts.

1. Beginning in or about mid-January, 2007, **ALBERTO CHANG CABRERA, a/k/a "Chino,"** provided credit card account numbers without authorization to **VIRGINIO RUDY SUAREZ, a/k/a "Lulo,"** and **MIGUEL SUAREZ.**
2. In January 2007, **VIRGINIO RUDY SUAREZ, a/k/a "Lulo,"** and **MIGUEL SUAREZ** used a computer to encode counterfeit access devices with unlawfully obtained credit card account numbers.
3. On January 21, 2007, **VIRGINIO RUDY SUAREZ, a/k/a "Lulo,"** used a

counterfeit credit card to purchase gasoline from a BP Gas station located in Miami Dade County, Florida.

4. On January 21, 2007, **VIRGINIO RUDY SUAREZ, a/k/a "Lulo,"** instructed **JULIO RAMIREZ, a/k/a "Cacho,"** how to use a counterfeit credit card to purchase gasoline from a BP Gas station located in Miami Dade County, Florida.

5. In January 2007, **VIRGINIO RUDY SUAREZ, a/k/a "Lulo,"** and **MIGUEL SUAREZ** used a computer to encode counterfeit access devices with unlawfully obtained credit card account numbers.

6. In January 2007, **VIRGINIO RUDY SUAREZ, a/k/a "Lulo,"** **MIGUEL SUAREZ,** and **MARIETTA MONTESINO-SUAREZ** possessed numerous counterfeit access devices, that is, credit card account numbers.

7. On February 1, 2007, **VIRGINIO RUDY SUAREZ, a/k/a "Lulo,"** and **MIGUEL SUAREZ** discussed the use of the counterfeit credit cards received from **ALBERTO CHANG CABRERA, a/k/a "Chino."**

8. On February 16, 2007, **CELIS ALVAREZ, a/k/a "Alexis,"** and **VIRGINIO RUDY SUAREZ, a/k/a "Lulo"** discussed **CELIS ALVAREZ's, a/k/a "Alexis,"** plan to use counterfeit credit cards to purchase merchandise from Walmart, located in Ft. Pierce, Florida.

9. On February 17, 2007, **CELIS ALVAREZ, a/k/a "Alexis,"** and **VIRGINIO RUDY SUAREZ, a/k/a "Lulo"** discussed providing counterfeit credit cards to **LAZARO FUNDORA, a/k/a "Tata."**

10. On February 17, 2007, **LAZARO FUNDORA, a/k/a "Tata,"** attempted to use a

counterfeit credit card to purchase goods from a WINN-DIXIE store located in Miami Dade County, Florida.

11. On February 20, 2007, **VIRGINIO RUDY SUAREZ, a/k/a “Lulo,” ALBERTO CHANG CABRERA, a/k/a “Chino,”** and **MIGUEL SUAREZ** discussed the use of counterfeit credit cards received from **ALBERTO CHANG CABRERA, a/k/a “Chino.”**

12. From January 2007 through March 2007, **JULIO RAMIREZ, a/k/a “Cacho,” VIRGINIO RUDY SUAREZ, a/k/a “Lulo,” MIGUEL SUAREZ, LAZARO FUNDORA, a/k/a “Tata,” MARIETTA MONTESINO-SUAREZ, ALBERTO CHANG CABRERA, a/k/a “Chino,”** and **CELIS ALVAREZ, a/k/a “Alexis,”** used counterfeit credit cards to purchase products.

All in violation of Title 18, United States Code, Section 1029(b)(2).

## **COUNT 2**

From in or about January, 2007, and continuing until the date of the return of this Indictment, the exact dates being unknown to the Grand Jury, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendants,

**VIRGINIO RUDY SUAREZ,  
a/k/a “Lulo,”  
MIGUEL SUAREZ,  
ALBERTO CHANG CABRERA,  
a/k/a “Chino,”  
MARIETTA MONTESINO-SUAREZ,  
JULIO RAMIREZ,  
a/k/a “Cacho,”  
LAZARO FUNDORA,  
a/k/a “Tata,”  
and  
CELIS ALVAREZ,  
a/k/a “Alexis,”**

did knowingly and with intent to defraud, produce, use, and traffic in one or more counterfeit access devices, that is, unlawfully obtained credit card account numbers, said conduct affecting interstate and foreign commerce; in violation of Title 18, United States Code, Sections 1029(a)(1) and 2.

### **COUNT 3**

On or about February 18, 2007, in Miami-Dade County, in the Southern District of Florida, and elsewhere, the defendant,

**MARIETTA MONTESINO-SUAREZ,**

during and in relation to a felony violation of Title 18, United States Code, Section 1029(a)(1), that is to knowingly and with the intent to defraud, possessed and used, and caused to be possessed and used, without lawful authority, a means of identification of another person, that is an American Express Card, account numberXXXXXXXXXX1003, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

### **FORFEITURE ALLEGATIONS**


1. The allegations of Counts 1 through 3 of this Indictment are re-alleged and by this reference fully incorporated herein for the purpose of alleging forfeitures to the United States of America of property in which the defendants have an interest, pursuant to Title 18, United States Code, Section 1029(c)(2) and Title 18, United States Code, Section 982(a)(2)(B).

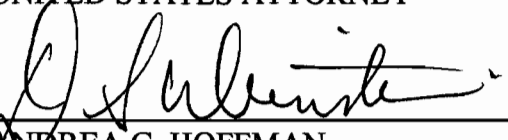
2. Upon conviction of any violation of Title 18, United States Code, Sections 1029(a)(1) and 1029(b)(2), the defendants shall forfeit to the United States any personal property used, or intended to be used to commit such violation(s) and any property constituting or derived from any proceeds obtained, directly or indirectly, as the result of such violation(s).

All pursuant to Title 18, United States Code, Section 1029(c)(2) and Title 18, United States  
Code, Section 982(a)(2)(B).

A TRUE BILL

  
FOREPERSON

  
R. ALEXANDER ACOSTA  
UNITED STATES ATTORNEY

  
ANDREA G. HOFFMAN  
ASSISTANT UNITED STATES ATTORNEY